


Judge	4819
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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UNITED STATES OF AMERICA

CASE NO. CR-1-02-054-2

v.

HONORABLE SUSAN J. DLOTT

TYREESE DORRAN PUGH

GOVERNMENT'S RESPONSE TO
MOTION TO EXTEND MOTION
DEADLINE

* * * * *

Comes now the United States of America, by and through counsel, and for its response to defendant's Motion to Extend Motion Deadline, states as follows:

As grounds for his motion, defendant contends that the United States has not yet completed its discovery. Thus, he requests additional time in which to address any potential motions after discovery is completed.

The United States submits that discovery has been completed. In fact, the United States held a discovery conference with defense counsel on 2 separate occasions in this matter -- on June 24, 2002, and on June 27, 2002. Because it was anticipated that this matter would proceed to trial on July 10, 2002, the United States previewed its case in detail with defense counsel on June 27, 2002, in an effort to begin a dialogue of plea negotiations.

Although discovery has been completed in sufficient time for the defendant to have filed any pretrial motions, the United States has no objection to the defendant's request for an extension of the motion deadline.

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Respectfully submitted,

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Wende C. Cross

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing was mailed on this 10th day of July, 2002, to Edward J. Felson, 36 East Seventh Street, Suite 1650, Cincinnati, Ohio 45202.

Wende C. Cross

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